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March 8, 2021

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**VIA EMAIL**

Hon. Denise Cote  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 1910  
New York, NY 10007

**Re: *United States v. Telemaque Lavidas, SI 19-cr-716***

Dear Judge Cote:

We are writing to request permission for Telemaque Lavidas to travel to Greece for business from April 6 through April 15, 2021. Ms. Zondra Jackson, the Probation Officer who is supervising Mr. Lavidas while he is on supervised release, has informed Mr. Lavidas that the Probation Department consents to this request and the government has also indicated that it has no objection.

Mr. Lavidas has now been on supervision for more than six months, which is the period of time that Probation requires before consenting to international travel. In addition, the Probation Department recently reduced Mr. Lavidas to low intensity supervision because of his success thus far on supervision.

For example, Mr. Lavidas has already completed the 100 hours of community service required for his first year of supervision. He performed the majority of that service at three organizations: Meals on Wheels, the Greek Church Homeless Ministry and an organization called Econnected, which provides tutoring to underprivileged children.

Mr. Lavidas is also working full time for his family business, where he worked prior to his arrest. He seeks to travel to work on a number of issues related to that business, including urgent matters concerning a proposed new factory construction in Greece. His wife and two children, one of whom was recently registered to begin at a pre-K school in New York City this coming fall, will stay in New York while he is traveling.

Mr. Lavidas has paid all fines, restitution and special assessments due to date in this case. Nonetheless, while it is not due and may never become due pursuant to the attached Consent Order of Restitution, Mr. Lavidas is placing into a trust account the additional \$93,215.50 restitution that he will owe if Marc Demane Debih does not pay his portion of the restitution. Mr.



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Lavidas has provided binding direction for the trust account to pay to the Clerk of the Court any amount of the restitution that remains unpaid 180 days after Mr. Debih's sentencing.

If approved, Mr. Lavidas would depart on April 6 and return on April 15, 2021, and he will provide a travel itinerary and address where he will be staying to the Probation Department.

Respectfully submitted,

\_\_\_\_\_/s/\_\_\_\_\_  
Jonathan R. Streeter

cc: U.S. Probation Officer Zondra Jackson  
AUSAs Richard Cooper and Daniel Tracer